

**IN THE U.S. DISTRICT COURT FOR MARYLAND,
SOUTHERN DIVISION**

BEYOND SYSTEMS, INC.)	
)	
Plaintiff)	
v.)	Case No. PJM 08 cv 0921
)	
WORLD AVENUE USA, LLC, et al.)	
Defendants)	
_____)	

**DEFENDANT, WORLD AVENUE USA, LLC’S CONSENT MOTION FOR EXTENSION
OF TIME *NUNC PRO TUNC* TO FILE REPLY MEMORANDUM IN SUPPORT OF ITS
MOTION FOR ENTRY OF PROTECTIVE ORDER REGARDING THE DEPOSITION
OF ITS GENERAL COUNSEL AND REPLY MEMORANDUM IN SUPPORT OF ITS
MOTION TO HOLD BEYOND SYSTEMS, INC. AND PAUL A. WAGNER IN
CONTEMPT OF COURT**

Defendant, WORLD AVENUE USA, LLC (“WAUSA”) hereby moves, on an unopposed basis, for an Order granting *nunc pro tunc*, an extension of time to file its Reply Memorandum in Support of its Motion for Entry of Protective Order Regarding the Deposition of its General Counsel and its Reply Memorandum in Support of Its Motion to Hold BEYOND SYSTEMS, INC. (“BSI”) and Paul A. Wagner in Contempt of Court, and states:

1. Defendant WAUSA filed a Motion for Entry of Protective Order Regarding the Deposition of its General Counsel, and separately, a Motion to Hold BSI and Paul A. Wagner in Contempt of Court.
2. The Reply Memorandum in support of each Motion were due on December 30th and Monday, January 3rd, respectively.

3. Counsel for BSI consented to the filing of each Reply Memorandum on Wednesday, January 5, 2011. *See* attached Exhibit 1. Counsel for WAUSA made the request for extension prior to the time that such filings were due.

4. The extension of time is made necessary by the fact that the New Year holiday fell around the time that the briefs were due. General Counsel for WAUSA, to whom the Motion relates, was out of the office on vacation and unable to consult respecting the content of the Reply Briefs at the pertinent time. Further, co-counsel for WAUSA was also out of the office and unable to consult during the affected period of time.

WHEREFORE, Defendant WORLD AVENUE USA, LLC respectfully requests entry of an Order granting an extension *nunc pro tunc* to file each Reply Memorandum on Wednesday, January 5, 2011.

Dated: January 5, 2011.

Respectfully submitted,

/s/

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--and--

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